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5 HON. TANA LIN  
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UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

ELECTRONIC SCRIPTING PRODUCTS,  
INC.

CASE NO. 23-cv-1344-TL

9 Plaintiff,

10 v.  
11

JONES SODA CO. and JONES SODA CO.  
(USA) INC.,

**STIPULATED MOTION FOR  
EXTENSION OF TIME FOR INITIAL  
DISCLOSURE DEADLINE AND JOINT  
STATUS REPORT AND (PROPOSED)  
ORDER**

NOTING DATE: November 27, 2023

12 Defendants.  
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**Stipulation**

Pursuant to LCR 7(d)(1), Plaintiff Electronic Scripting Products, Inc. (“Plaintiff”) and Defendants Jones Soda Co. and Jones Soda Co. (USA) Inc. (“Defendants”), by and through their undersigned counsel of record, jointly stipulate and agree as follows:

1. Plaintiff filed the Complaint in this action on August 30, 2023;
2. Plaintiff served the Complaint on Defendants on September 20, 2023;
3. In accordance with Fed. R. Civ. P. 12(a)(1)(A), Defendants’ response to the

Complaint initially was due by October 11, 2023 (the “Answer Deadline”);

4. On October 9, 2023, the Parties submitted their first Stipulated Motion for Extension of Time to Answer Complaint (Dkt. #10), which was granted by the Honorable Brian A. Tsuchida on October 10, 2023, extending the Answer Deadline to November 10, 2023.

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STIPULATED MOTION FOR EXTENSION OF TIME AND  
(PROPOSED) ORDER - 1  
CASE NO. 23-cv-1344-TL

BANIE & ISHIMOTO, LLC  
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PALO ALTO, CA 94303  
Telephone: (650) 241-2774  
Fax: (650) 241-2770

1       5. On November 10, 2023, the Parties submitted their second Stipulated Motion for  
2 Extension of Time to Answer Complaint (Dkt. #10), which was granted on November 14, 2023,  
3 extending the Answer Deadline to December 10, 2023.

4       6. On October 17, 2023, the Court issued an Order Regarding Initial Disclosures and  
5 Joint Status Report for Patent Cases (Dkt. No. 15). Under this order, the initial disclosure deadline  
6 is November 28, 2023, and the Joint Status Report is due by December 12, 2023.

7       7. The Parties have agreed to a 14-day extension of the initial disclosure and Joint  
8 Status Report dates to allow the Parties an additional opportunity to explore the possibility of  
9 settlement, such that the initial disclosure date deadline would be December 12, 2023 and the Joint  
10 Status Report due by December 26, 2023; and

11        8.      No Party will be prejudiced by the above deadline, and this motion is not made for  
12 the purpose of delay or any other improper purpose.

DATED this 27<sup>th</sup> day of November, 2023.

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Attorneys for Plaintiff Electronic Scripting  
Products, Inc.

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**STIPULATED MOTION FOR EXTENSION OF TIME AND  
(PROPOSED) ORDER - 2  
CASE NO. 23-cv-1344-TL**

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## (Proposed) Order

IT IS SO ORDERED. The initial disclosure date deadline is December 12, 2023, and the Joint Status Report is due by December 26, 2023.

DATED: November 30, 2023

Tana Lin  
Tana Lin  
United States District Judge

**STIPULATED MOTION FOR EXTENSION OF TIME AND  
(PROPOSED) ORDER - 3**  
**CASE NO. 23-cv-1344-TL**

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